

- UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

3. The C&B also invests in the APA President plenary authority to enter into contracts with third parties on behalf of the APA and its Domiciles and neither the Domiciles nor their elected representatives have any authority over such matters.

4. Given the above, as a matter of law, the DFW Domicile lacks a legal interest in or standing to object to or challenge the Stipulation of Settlement entered into by the APA and Plaintiff Secretary of Labor, U.S. Department of Labor (“DOL”) to resolve a protest concerning the conduct of the 2014 DFW Domicile election.

For these reasons, the APA respectfully submits, the Court should deny the DFW Domicile’s Motion and Objection and grant the pending Agreed Motion for Entry of Consent Decree jointly filed by the APA and the DOL.

Respectfully submitted,

s/ Sanford R. Denison

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and the Dallas-Fort Worth Domicile

Dated: November 10, 2015

CERTIFICATE OF SERVICE

On November 10, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that a copy of the foregoing was served electronically to the Plaintiff's counsel at the address shown below:

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In addition, I certify that a copy of the foregoing was served electronically and via first-class mail on the following:

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